

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

FORTRES GRAND CORPORATION, an Indiana Corporation,)	
)	
Plaintiff,)	
)	Civil Action No. 3:12 CV 535
v.)	
)	Judge Philip P. Simon
WARNER BROS. ENTERTAINMENT INC., a Delaware corporation,)	
)	
Defendant.)	

**JOINT MOTION TO EXTEND TIME TO RESPOND TO MOTION TO
DISMISS AND REPLY TO RESPONSE**

Pursuant to Local Rules 6-1 and 7-1(d)(3), the parties jointly move this Court for an extension of time for Plaintiff Fortres Grand Corporation ("Fortres Grand") to respond to Defendant Warner Bros. Entertainment Inc.'s ("Warner Bros.") Motion to Dismiss and for Warner Bros. to reply to Fortres Grand's Response. In support of this motion, the parties state as follows:

1. Fortres Grand filed its complaint on September 19, 2012 and served it on Warner Bros. on September 25, 2012.
2. Warner Bros.'s response was originally due on October 16, 2012.
3. Pursuant to Local Rule 6-1(b), on October 22, 2012, Warner Bros. filed a notice extending the time to respond to Fortres Grand's Complaint through November 13, 2012 and then, pursuant to Local Rule 6-1(a), moved for and was granted two further extensions of time through December 10, 2012.
4. On December 10, 2012, Warner Bros. responded to Fortres Grand's Complaint by filing a Motion to Dismiss.

5. Fortres Grand's Response is due December 27, 2012, two days after the Christmas holiday. Because of the holidays and the complexity of the issues raised in the Motion to Dismiss, Fortres Grand asked Warner Bros. to agree to an extension of time to respond. Warner Bros.'s counsel consented to an extension through January 28, 2013.

6. In turn, Fortres Grand consented to an extension of Warner Bros.'s Reply deadline through February 14, 2013.

7. This extension is sought for good cause and not for purposes of delay. WHEREFORE, the parties respectfully move the Court for an order extending Fortres Grand's time to respond to Warner Bros.'s Motion to Dismiss and Warner Bros.'s time to reply to Fortres Grand's Response, as set forth above.

Dated: December 24, 2012

Respectfully submitted,

PATTISHALL, McAULIFFE, NEWBURY,
HILLIARD & GERALDSON LLP

JENNER & BLOCK LLP

By: /s/Christopher R. Putt
Phillip Barengolts
Elisabeth K. O'Neill
311 South Wacker Drive, Suite 5000
Chicago, Illinois 60606
(312) 554-8000

By: /s/ Keith Porapaiboon
Keith Porapaiboon
353 N. Clark Street
Chicago, Illinois 60654
(312) 222-9350

MAY OBERFELL LORBER
Christopher R. Putt
4100 Edison Lakes Parkway, Suite 100
Mishawaka, Indiana 46545
(547) 243-4100

Andrew H. Bart
919 Third Avenue, 37th Floor
New York, New York 10022
(212) 891-1600

Andrew J. Thomas
633 West Fifth Street, Suite 3600
Los Angeles, California 90071
(213) 239-5100

Attorneys for Plaintiff Fortres Grand Corp.

Attorneys for Defendant Warner Bros. Entertainment Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **JOINT MOTION TO RESPOND TO MOTION TO DISMISS AND REPLY TO RESPONSE** was filed electronically with the United States District Court on December 24, 2012. Notice of this filing will be sent to all attorneys of record by operation of the Court's electronic filing system.

/s/Christopher R. Putt